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United States Attorney

2 EUMI L. CHOI (WVBN 0722)  
3 Chief, Criminal Division

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Assistant United States Attorney

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6 San Francisco, California 94102  
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8 Attorneys for Plaintiff

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,  
14 Plaintiff,

15 v.  
16

17 JOE CHU RANG WONG, and  
18 STACY WU  
19 Defendants.

Criminal No. CR 05-00073 SI

**STIPULATION AND [PROPOSED]  
ORDER EXCLUDING TIME**

20 The above-captioned matter was scheduled to come before the Court on July 28,  
21 2005, for plea. JOE CHU RANG WONG represented by John Runfola, Esq., STACY  
22 WU represented by Douglas Rapport, Esq. and the government, represented by Philip J.  
23 Kearney, Assistant United States Attorney, submitted draft plea agreements for the  
24 Court's review prior to the hearing. By stipulation of the parties the matter was continued  
25 until September 2, 2005, at 11:00 a.m. in United States District Court for entry of pleas.

26 The parties request that the Court make a finding that the time between July 28,  
27 2005, and September 2, 2005, should be excluded under the Speedy Trial Act, 18 U.S.C.

28 **STIPULATION AND [PROPOSED]  
ORDER EXCLUDING TIME  
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05 JUL 28 PM 1:04  
RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**FILED**

JUL 29 2005

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

§ 3161(h)(8)(A), because the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. That finding is based on counsel for WU's request for additional time to accommodate a pre-planned vacation and counsel for the government's request to adequately inform victims pursuant to 18 U.S.C. § 3771, and to allow all parties to adequately prepare the matter, taking into account the exercise of due diligence. That finding should be made pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

The parties hereby agree to and request that the case be continued until September 2, 2005 at 11:00 a.m. and that an additional exclusion of time until that date be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, Section 3161(h)(8)(A), because the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial.

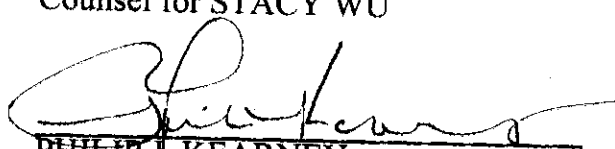
DATED:

JOHN RUNFOLA, ESQ.  
Counsel for JOE CHU RANG WONG

DATED:

DOUGLAS RAPPAPORT, ESQ.)  
Counsel for STACY WU

DATED: 7/28/05

  
PHILIP J. KEARNEY  
Assistant United States Attorney

So ordered.

DATED:

SUSAN ILLSTON  
UNITED STATES MAGISTRATE

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DATED:

  
JOHN RUNFOLA, ESQ.  
Counsel for JOE CHU RANG WONG

DATED:

  
DOUGLAS RAPPAPORT, ESQ.  
Counsel for STACY WU

DATED: 7/26/05

  
PHILIP J. KEARNEY  
Assistant United States Attorney

So ordered

DATED: 7/28/05

  
SUSAN ILLSTON  
UNITED STATES MAGISTRATE

District  
Judge

STIPULATION AND (PROPOSED)  
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DATED:

JOHN KUNFOLA, ESQ.  
Counsel for JOE CHU RANG WONG

DATED: 7/28/05

DOUGLAS RAPPAPORT, ESQ.  
Counsel for STACY WU

DATED: 7/28/05

PHILIP I. KEARNEY  
Assistant United States Attorney

So ordered.

DATED:

SUSAN ILLSTON  
UNITED STATES MAGISTRATE

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